IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MARION COUNTY

ADAM EUGENE KOBS, an individual, and **N.K.,** a minor, by and through his father and natural guardian, ADAM E. KOBS**,** *Plaintiffs,* v. **SILVERTON SHELTERING SERVICES** d.b.a. **"SHELTERING SILVERTON,"** an Oregon public-benefit nonprofit corporation; **SARAH WHITE**, individually; **JOSEPH SCHMAUS**, individually; **JORDAN SIMS**, individually; and **TRAVIS DEAN GLIDDEN**, individually, *Defendants.*	Case No. 25CV57849 PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR SANCTIONS AGAINST GUY KEATING, SARAH WHITE, SHELTERING SILVERTON, AND REQUEST FOR SANCTIONS AGAINST TYLER HONN

INTRODUCTION

Defendants' Response is a compounding of the very misconduct at issue. It repeats misleading statements, ignores controlling facts and law, telling omissions, and substitutes personal attacks and procedural sleight-of-hand for substantive defense. This Reply addresses each newly raised deception and reinforces the overwhelming record warranting sanctions by exposing the **deliberate pattern and practice** behind Defendants' tactics:

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1. **False Certification to the Court:** Keating's and Honn's declarations contained materially false and misleading statements about service, crafted to create a fraudulent basis for dissolution.
2. **Bad-Faith Litigation and Communication Tactics:** Counsel's documented pattern of ignoring substantive emails while responding only to administrative matters violates their ethical duties (RPC 1.3, 3.2, 3.4) and is a calculated tactic to avoid creating a record, manufacture defenses, and burden a *pro se* party.
3. **Procedural Violations:** Defendants filed amended pleadings without leave after an opposition was filed, in direct violation of ORCP 23, to perpetuate their false narrative.
4. **Willful Spoliation:** The shelter admitted to the automatic destruction of key CCTV footage after the duty to preserve attached, taking zero steps to prevent it—a legally insufficient defense.

The accusations of "threats" and "A.I. flooding" are irrelevant, prejudicial distractions from this substantive misconduct.

ARGUMENT

I. DEFENSE COUNSEL'S FALSE STATEMENTS AND PROCEDURAL SLEIGHT-OF-HAND WARRANT SANCTIONS UNDER ORCP 17 AND RPC 3.3.

A. The "Never Served" Assertion Was a Knowingly False Certification, Designed to Mislead a Busy Court.

Keating's declarations that he was "never served by plaintiff with the Preservation Order" were false when made. His Response now attempts to confuse the issue by focusing on Sarah White's correction about the **Motion for Preservation** (Keating incorrectly references White's "oversight" about the Order being served to her, when it was always the Motion sent beside the Summons), not the signed **Order**. This is a disingenuous distraction.

1. **The Target of the Deception is Clear.** Sarah White corrected her "oversight" regarding service of the **Motion for Preservation Order and Summons** on November 25. This is

distinct from Keating's false claim about the **court-signed Order**, which he received on December 6. His conflation of the two is not an error; it is a tactic. By presenting the quick, false fact that he was "never served" in his original Motion to Dissolve, he sought to secure its dissolution under the court's radar, relying on a busy judge to overlook the distinction. This is the essence of bad-faith advocacy.

2. **The "Proposed Order" Argument is a Revealing, Post-Hoc Misdirection.** Keating is supposedly a seasoned litigator. He knows **ORCP 79 B(1)** allows for relief *ex parte* without notice where "immediate and irreparable injury" is shown. His complaint about not receiving a "proposed" order reveals his improper goal. **Clearly, this argument is a newly-minted defense.** In his **original** December 17 Declaration and Motion to Dissolve, the word **"proposed" appears ZERO times**. In his **amended** December 23 Declaration and Motion, filed *after* being confronted with proof of service, the word **"proposed" *still* appears ZERO times**. It is only in his **Reply to this Sanctions Motion**—his third pleading attempt—that the word **"proposed" MIRACULOUSLY appears five (5) written times as a procedural power play at the precisely timed last moment**. This linguistic pivot is not a clarification; it is a naked attempt to retrofit a defense after his original, categorical falsehood was exposed. Accordingly, any reasonable and objective Plaintiff, such as myself, would have a reasonable assumption that Mr. Keating meant “court-signed” executed Preservation Order not being served all along, not a proposed “pre-signed” version that **should** strike Keating as inapposite to a basic ORCP 79 ex parte filing. To echo, this is not an accidental truth, this can only be seen as deliberate sleight-of-hand defensive technique: keep the record ambiguous until you are forced to clarify (such as a sanctions motion), then clarify last moment, when it counts.
3. **The Unauthorized "Amendment" Compounds the Violation.** After Plaintiff filed his Opposition exposing the falsehood on December 18, Defendants lost the right to amend as a matter of course. **ORCP 23 A** requires leave of court or adverse party consent after a responsive pleading is served. Plaintiff's December 19 conferral email explicitly withheld consent. Defendants' filing of "Amended" documents on December 23 without court

leave was a **knowing procedural violation** that allowed Keating to re-file a nearly identical false declaration, perpetuating the fraud.

B. The Refusal to Acknowledge the Tort Claim Notice is Further Proof of a Campaign to Obscure the Truth.

Defendants' Response deliberately downplays and avoids the **Tort Claim Notice delivered October 6, 2025**, which contained an explicit, written preservation demand. Keating's refusal to engage with this document is telling. It is the foundational proof that the duty to preserve attached well before the shelter's "automatic" system deleted the footage. His silence on this point in his defense is an admission by omission, demonstrating an unwillingness to confront the objective truth that undermines his client's position and his own litigation strategy.

C. This Sanctions Motion is the Necessary Corrective.

The misconduct documented required this Motion for Sanctions to act as a septic cleanse, pouring clarity over the dishonesty to restore integrity to the record. **Even in his Reply, Keating continues to hide, unacknowledge facts, and deceive.** His newfound focus on "proposed" orders and conflation of service facts are sleight-of-hand techniques deployed to avoid sanctions, not to correct the record. A lawyer acting in good faith would have fully and publicly retracted his false statements, not pivoted to new, misleading arguments.

D. Counsel's Inconsistent Objections to Email Conferral Reveal a Tactical, Not Principled, Litigation Posture.

Defendants' Response loudly objects to the *ex parte* Preservation Order by claiming a failure of "notice" and conferral under ORCP 79. Yet, they raise **no such objection to the Motion for Sanctions now before the Court**. This Motion was likewise preceded by a formal UTCR 5.010 conferral attempt made **exclusively by email** on December 19, 2025—a fact they do not dispute. Their silence here is telling. If email conferral was procedurally deficient for the Preservation Order, why is it suddenly acceptable/unmentionable for this sanctions motion? Did Keating forget to mention it? The telling answer is that the conferral objection was never a matter of principle; it was a **convenient procedural power play used only when it served to attack a court order they wished to dissolve**. Their selective invocation of procedural rules is further evidence of a strategy to obstruct and manipulate the process, not to adhere to it in good faith.

E. Communication Protocol Update.

Plaintiff has instituted a new email protocol (adamkobs1984@proton.me) to ensure reliable, documented communication moving forward. Defense counsel's choice to comply with, object to, or ignore this protocol is his own, governed by his ethical duties. **This procedural update in no way concedes any point regarding past conferral attempts or the documented pattern of non-response.** Plaintiff's position on the historic record of bad-faith communication remains unchanged and is supported by the evidence in **Exhibit A**.

II. DEFENSE COUNSEL'S PATTERN OF BAD-FAITH COMMUNICATION VIOLATES ETHICAL DUTIES AND CONSTITUTES OBSTRUCTION.

A review of the communication record (Exhibit A) reveals an indisputable and calculated pattern:

- **Total Substantive Emails from Plaintiff to Keating/Honn That Reasonably Required Response: >12** (including conferral attempts, discovery requests, settlement offers, procedural inquiries), (the remaining were procedural service emails).
- **Total Substantive Responses from Keating/Honn: 7**.

This is not neglect. It is a **strategy**. Counsel responds *only* to emails that simplify service for themselves (e.g., confirming email acceptance). They systematically **ignore every substantive email** requiring good-faith engagement: settlement, discovery compliance, conferral, and demands to correct false statements.

Regardless of Keatings personal and professional approach regarding email communications, he has a professional obligation of **candor, diligence, and fairness** to treat each email as a proper legal communication from the Plaintiff, issued to serve a specific purpose of moving the case forward to resolution. The Plaintiff has **over-explained with extreme care** to Keating about his reliance on email communication, and its relevance and importance to the case. **To date, no explicit objection response has ever been made about email conferral or exchange of debate until now, when it was convenient for Keating to bring it up.** Further, to

be continuously ignored by Keating is not only disrespectful, it is disruptive, it is obstruction of this court's process, and it is simply unprofessional.

This pattern violates multiple Oregon Rules of Professional Conduct:

- **RPC 1.3 (Diligence):** A lawyer shall not neglect a legal matter.
- **RPC 3.2 (Expediting Litigation):** A lawyer shall make reasonable efforts to expedite litigation.
- **RPC 3.4 (Fairness to Opposing Party):** A lawyer shall not obstruct another party's access to evidence or fail to make reasonably diligent efforts to comply with legally proper discovery requests.

This tactical non-engagement serves to: (1) avoid creating a written record of their positions; (2) manufacture a false "failure to confer" defense; and (3) exponentially increase the burden on a *pro se* plaintiff. The Court should view their entire litigation posture through the lens of this demonstrable pattern of gamesmanship.

III. THE RECORD CONCLUSIVELY ESTABLISHES SPOLIATION; THE "AUTOMATIC DELETION" DEFENSE IS LEGALLY INSUFFICIENT.

A. The Duty to Preserve Arose No Later Than October 6, 2025.

The common-law duty to preserve evidence arises when a party reasonably anticipates litigation. The formal Tort Claim Notice—an unequivocal precursor to a lawsuit—was delivered to and signed for by Sheltering Silverton on **October 6, 2025**. This notice contained an explicit, written preservation demand in its final paragraph (Section 5):

"You are hereby put on notice of your obligation to preserve all evidence related to the allegations in this notice. This duty arises under Oregon law and includes all video surveillance footage, internal incident logs, emails, text messages, and personnel records related to Travis Glidden, Jordan Sims, and the claimants. This duty extends to all evidence, regardless of your

stated retention policies. The doctrine of spoliation will be invoked should any relevant evidence be destroyed, altered, or made unavailable, and may result in sanctions under Oregon law."

The duty attached at that moment.

B. The Shelter's Admission Constitutes Direct Evidence of Spoliation.

Sarah White's Amended Declaration states: **"All of the footage that plaintiff has requested in relation to this matter was automatically deleted before plaintiff filed this suit and cannot be recovered."** This is an admission of spoliation.

1. **"Automatic" Deletion is Not a Defense.** The duty to preserve requires **affirmative action to suspend routine destruction**. The shelter took none. Their inaction *is* the act of spoliation.
2. **The Timeline Proves Post-Notice Destruction.** The relevant footage was from August 2024 onward. White admits it was deleted *after* October 6, 2025 (post-tort claim) but before the suit was filed. The footage was therefore destroyed *after* the legal duty attached.

IV. DEFENDANTS' "UNDULY BURDENSOME" AND "CONFERRAL" ARGUMENTS ARE DISINGENUOUS DISTRACTIONS.

A. The "Unduly Burdensome" Argument is Without Merit and Designed to Obstruct.

The Preservation Order required a simple, sworn declaration about the CCTV system's basic technical details—information essential to any litigation and within the client's control. If the shelter finds this narrow declaration "unduly burdensome," it reveals an intent to resist *any* court order and sets a dangerous precedent for endless, obstructive motion practice designed to prevent the case from ever reaching trial on the merits. This is the very first signed order ever presented to the shelter, and they are already resistive and uncompliant. The Court should reject this obstruction.

B. Conferral Arguments Are a Moot Distraction.

Any argument about Plaintiff's conferral efforts pre- or post-Order is a red

herring. **ORCP 79** authorizes *ex parte* relief without prior notice where immediate irreparable injury is shown, as the Court found here. Plaintiff's ORCP 79 certification was proper. The Order was signed. Defendants' subsequent, bad-faith refusal to comply is the only relevant issue.

V. ACCUSATIONS OF "A.I. GENERATED" PLEADINGS AND "FLOODING" ARE UNSUBSTANTIATED AND IRRELEVANT.

These are *ad hominem* attacks designed to prejudice the Court against a *pro se* litigant.

1. **Every Motion Was Necessary:** Each motion filed was a direct, justified response to Defendants' obstructive conduct or a necessary procedural step. Motions for a **Guardian ad Litem for N.K.**, for a **redacted address and CIF form**, for **alternate service** for unserved parties, to **oppose Defendants' Motion to Dismiss**, to **compel insurance disclosure**, to **compel addresses for Sims, Glidden, and Schmaus**, for a **time extension to serve**, for **Preservation Order of CCTV and ESI**, to **oppose Defendant's Motion to Dissolve**, and this **Motion for Sanctions** were all necessitated by the demands of the litigation or Defendants' own actions. None were "unwarranted" or "unnecessary"; that claim is absurd on its face.
2. **No Evidence of Improper "A.I. Flooding":** Defendants provide zero evidence for this sweeping allegation. All filings are the product of Plaintiff's own work, informed by proper legal research conducted through online resources and materials from the Marion County law library. A single citation error, promptly corrected, does not substantiate this prejudicial claim. Further, while acceptable to assert the need to correct a citation error, it is improper for Defendants to introduce personal research choices as an ad hominem distraction from the core issues at hand, and to deflect attention from themselves.

VI. PLAINTIFF'S LITIGATION POSTURE REGARDING ORAL ARGUMENT.

Consistent with the statement in Plaintiff's Motion for Sanctions, Plaintiffs' written submissions are intended to stand as the primary vehicle for legal argument. Should the Court

press for oral argument on points not squarely addressed in the briefing, Mr. Kobs respectfully requests time to provide a supplemental written response.

VII. TYLER HONN IS EQUALLY SANCTIONABLE

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Both the original and amended Motions to Dissolve were signed by **Guy Keating and Tyler Honn**. By signing these motions, which were explicitly "supported by" the false Keating and White declarations, Honn certified the factual assertions therein pursuant to ORCP 17. He is therefore equally responsible for presenting factual contentions lacking evidentiary support.

CONCLUSION

The record is replete with misconduct: **false statements to the Court (ORCP 17, RPC 3.3), willful spoliation of critical evidence, disobedience of a court order, knowing procedural violations (ORCP 23), and a documented pattern of bad-faith litigation and communication tactics (RPC 1.3, 3.2, 3.4).** Defendants' Response compounds this misconduct with misdirection, personal attacks, telling techniques, and continued deception.

Sanctions are necessary to deter such conduct, to remedy the severe prejudice to Plaintiffs, and to protect the integrity of the judicial process from this pattern of obstruction. **Plaintiffs respectfully request that the Court, after notice and an opportunity for an expedited hearing, impose the following sanctions and grant the following relief in a staged manner as outlined in the original Motion:**

A. IMMEDIATE INTERIM AND CORRECTIVE RELIEF:

1. **Order to Compel Compliance & Show Cause:** Issue an Order (1) compelling Defendant Sheltering Silverton to file, within 7 days, the sworn technical declaration required by this Court's December 5, 2025 Preservation Order; and (2) requiring Defendants Sheltering Silverton, Sarah White, and their counsel Guy Keating to appear and show cause why they should not be sanctioned.

2. **Striking of False Filings:** Strike the false factual assertions in the December 17 and December 23, 2025 Declarations of Guy Keating, and strike the associated "Motion to Dissolve or Modify Preservation Order" in its entirety as founded upon false certifications.

3. **Corrective Declaration:** Order Guy Keating to file a corrective declaration, under penalty of perjury, within 7 days, admitting service of the Preservation Order and retracting his false statements.

B. FOLLOWING AN EXPEDITED EVIDENTIARY HEARING:

4. **Evidentiary and Issue Sanctions:** Upon a finding of spoliation and willful disobedience, issue an order that, at trial, the jury shall be instructed that it must presume the destroyed CCTV footage would have been unfavorable to Defendants and would have substantiated Plaintiffs' claims, and that Defendants are precluded from offering any testimony or argument contradicting this adverse inference.

5. **Monetary Sanctions:** Order Sheltering Silverton and Sarah White, jointly and severally, and Guy Keating and his firm, Schulte, Anderson, Downes, Aronson & Bittner P.C., jointly and severally, to pay all Plaintiffs' reasonable expenses incurred in investigating the spoliation, opposing the Motion to Dissolve, and prosecuting this sanctions motion.

C. REFERRAL AND TERMINATING RELIEF:

6. **Referral for Disciplinary and Criminal Investigation:** Upon a finding of knowing falsity, refer Guy Keating's conduct to the Oregon State Bar for investigation of violations of RPC 3.3 (Candor) and RPC 8.4 (Misconduct), and refer the matter of his sworn declarations to the Marion County District Attorney for investigation of potential criminal violations of *ORS 162.065* (Perjury).

7. **Judgment on Liability:** Upon a finding of willful spoliation coupled with irreparable prejudice to Plaintiffs' ability to prosecute their claims, enter judgment on the issue of liability in favor of Plaintiffs and against Defendants Sheltering Silverton and Sarah White on all relevant claims.

Respectfully submitted,

DATED: January 15th, 2026

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential
Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkobs1984@proton.me

EXHIBIT A: SUMMARY OF COMMUNICATIONS -- PLAINTIFF'S GOOD-FAITH OUTREACH VS. DEFENSE COUNSEL'S SELECTIVE RESPONSES

Date	Direction	Subject / Key Points	Type	Response?	Notes
10/10/2025	Keating → Plaintiff	Introduction of Guy Keating as counsel initially for Sheltering Silverton	Substantive	**YES**	Appearance of counsel, mentions receipt of **Tort Claim Notice**
10/17/2025	Plaintiff → Keating	ORCP 36 B(2) insurance request initial	Substantive	**YES**	States that suit has not been filed, and that insurance disclosure is not required
10/17/2025	Plaintiff → Keating	Plaintiff asked if insurance info preserved for future request	Substantive	**NO**	Ignored.
10/17/2025	Plaintiff → Keating	Asked for return of "program strikes" particulars from shelter	Substantive	**NO**	Ignored.
10/21/2025	Plaintiff → Keating	Requested OEC 408 settlement discussion	Substantive	**NO**	Ignored.

10/23/2025	Plaintiff → Keating	Revocation of mediation offer; requests service instructions for complaint.	Substantive	**NO**	Ignored.
12/1/2025	Plaintiff → Keating	Asks which parties he represents; settlement inquiry; asks for service acceptance.	Substantive	**YES**	Confirms rep for Shelter, White, Schmaus only. Ignores settlement.
12/4/2025	Plaintiff → Keating	Last attempt at settlement; spoke of settlement conference	Substantive	**YES**	No settlement. Intends to file MTD and discovery.
12/5/2025	Plaintiff → Keating	Requests consent to accept service by email for all pleadings.	Procedural	**YES**	Consents to email service.
12/6/2025	Plaintiff → Keating	**Serves court-signed Preservation Order**. Provides detailed compliance instructions.	Procedural/ Substantive	**NO**	Critical service of Order; ignored.

12/8/2025	Plaintiff → Keating	ORCP 36 B(2) Insurance Disclosure Request (Due 12/22).	Discovery / Substantive	**NO**	Ignored.
12/8/2025	Plaintiff → Keating	ORCP 43 Request for contact info for Sims & Glidden.	Discovery / Substantive	**NO**	Ignored.
12/10/2025	Plaintiff → Keating	Serves Opposition to MTD and Proposed Order.	Procedural	**NO**	Service only; no response needed.
12/12/2025	Plaintiff → Keating	Serves filed Opposition to MTD and proposed order.	Procedural	**NO**	Service only; no response needed.
12/15/2025	Plaintiff → Keating	Notifies intent to use Odyssey File & Serve; asks for confirmation.	Procedural	**YES**	Requests dual email + Odyssey service.
12/15/2025	Plaintiff → Keating	Clarifies: "You want me to send both Odyssey AND Gmail?"	Procedural	**YES**	"Yes, please."
12/15/2025	Plaintiff → Keating	Serves letter to Judge Wren re: address confidentiality, motion to compel contact info.	Substantive	**NO**	Ignored.

12/18/2025	Plaintiff → Keating	Serves Opposition Motion to Dissolve & Order, Notice of Conferral	Conferral/Substantive	**NO**	**Ignored.**
12/19/2025	Plaintiff → Keating	**UTCR 5.010 Conferral** -- detailed demand to correct false declarations; notice of intent to file sanctions.	Conferral/Substantive	**NO**	**Critical conferral ignored.**
12/19/2025	Plaintiff → Keating	Reminder ORCP 36 (B)2 Insurance Disclosure deadline by 22nd	Conferral/Substantive	**NO**	Ignored.
12/19/2025	Keating → Plaintiff	Partial Insurance Disclosures received (Dec's)	Discovery	**YES**	Received partial insurance docs
12/22/2025	Plaintiff → Keating	Reminder of conferral deadline for Motion to Dissolve corrections (5:00 PM).	Conferral	**NO**	Ignored.

12/22/2025	Plaintiff → Keating	Request for complete insurance disclosure (ORCP 36 B(2)); sets deadline.	Discovery	**NO**	Ignored.
12/22/2025	Plaintiff → Keating	Serves Motions for Confidential Info Form & to Compel Last Contact Info.	Substantive	**NO**	Ignored.
12/22/2025	Plaintiff → Keating	Serves Notice of Continued Redaction of Address	Procedural	**NO**	Ignored.
12/23/2025	Plaintiff → Keating	Serves Motion for Leave to File Sur-Reply.	Procedural	**NO**	Ignored.
12/29/2025	Plaintiff → Keating	Serves Motion to Compel Insurance Disclosure.	Discovery	**NO**	Ignored.
12/30/2025	Plaintiff → Keating	Serves Motion for Appointment of Guardian Ad Litem.	Procedural	**NO**	Ignored.
12/30/2025	Plaintiff → Keating	**Serves Motion for Sanctions** (ORCP 17 safe harbor).	Substantive	**NO**	No corrective action taken.

1/2/2026	Plaintiff → Keating	Serves Notice of Supplemental Authority re: Sanctions.	Substantive	**NO**	Ignored.
1/5/2026	Plaintiff → Keating	Serves Notice of Filing Oct 10 counsel appearance & amended ORCP 79 certification.	Substantive	**NO**	Ignored.
1/5/2026	Plaintiff → Keating	Serves Notice re: Tyler Honn's signature on sanctionable filings.	Substantive	**NO**	Ignored.
1/7/2026	Plaintiff → Keating	Serves proposed order to compel last known address & election form.	Substantive	**YES**	Gives blanket objection to all pending motions; conferral; privacy issues, etc.
1/8/2026	Plaintiff → Keating	**Formal Notice**: inability to confer by phone; all conferral must be in writing.	Procedural/Conferral	**NO**	Ignored.
1/8/2026	Plaintiff → Keating	Serves proposed order for leave to file sur-reply	Procedural/Conferral	**NO**	Ignored.

1/8/2026	Plaintiff → Keating	Serves proposed order for CIF form & address redaction	Procedural	**NO**	Ignored.
1/8/2026	Plaintiff → Keating	Serves proposed Order on Motion to Compel Contact Info; requests objections.	Procedural	**YES**	Objection filed (1/12). No substantive engagement.
1/12/2026	Plaintiff → Keating	Serves proposed Order re: Guardian Ad Litem.	Procedural	**NO**	Ignored.
1/12/2026	Plaintiff → Keating	Serves proposed Order re: Insurance Motion.	Procedural	**NO**	Ignored.
1/14/2026	Plaintiff → Keating	Formal Notice. New Proton email address for all pleadings	Procedural/Conferral	**NO**	Ignored.
1/15/2026	Plaintiff → Keating	Serves this Reply for Defendant's response to sanctions motion	Procedural	**NO**	Servicing only. Reply not required.

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SUMMARY OF DEFENSE COUNSEL'S 7 RESPONSES (ALL SELECTIVE):

1. **10/10/2025:** Introduction as counsel; acknowledges receipt of Tort Claim Notice.
2. **10/17/2025:** Responds to initial insurance request, states suit not filed.
3. **12/1/2025:** Confirms representation (Shelter, White, Schmaus). Ignores settlement.
4. **12/4/2025:** Responds to last settlement attempt; states intent to file MTD.
5. **12/5/2025:** Consents to email service.
6. **12/15/2025:** Requests dual email + Odyssey service, confirms "Yes, please".
7. **1/12/2026:** Objects to proposed order (no substantive conferral).

PATTERN: Defense counsel responds **only** to procedural emails that either (a) simplify service for them, or (b) allow a blanket objection that ends discussion. They systematically **ignore every substantive email** requiring good-faith engagement: settlement, discovery compliance, conferral, and correction of false statements. This is a calculated tactic to obstruct and manufacture a false "failure to confer" record.

CERTIFICATE OF SERVICE UNDER UTCR 5.100

I, **Adam E. Kobs**, Plaintiff appearing pro se in the above-entitled matter, hereby certify under penalty of perjury that on **January 15, 2026**, I served the following document(s) on all parties of record via the means specified:

- **PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR SANCTIONS AGAINST GUY KEATING, SARAH WHITE, SHELTERING SILVERTON, AND REQUEST FOR SANCTIONS AGAINST TYLER HONN**

Service was made as follows:

1. Electronic Mail (Email): I served the document by email to the following counsel of record, who have previously consented to service by email under ORCP 9 G, with the document attached in PDF format:

- Guy E. Keating, Esq. (gkeating@schulte-law.com)
- Tyler C. Honn, Esq. (thonn@schulte-law.com)
- Matthew Smith, Esq. (msmith@schulte-law.com)
- Rochelle Murphy, Esq. (rmurphy@schulte-law.com)

2. Oregon Odyssey File & Serve System: I contemporaneously filed and served the document via the Odyssey File & Serve system, which provides electronic service to all registered counsel of record in this case.

This service complies with ORCP 9 and UTCR 5.100.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Date: January 15th, 2026

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential
Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkobs1984@proton.me